

October 3, 2014

BY ECF & HAND

Honorable Robert W. Sweet
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1212

Re: *Deutsche Alt-A Securities Mortgage Loan Trust, Series 2006-OA1, by HSBC Bank USA, National Association, as Trustee v. DB Structured Products, Inc.*, 12-cv-8594 (S.D.N.Y.);
Deutsche Alt-A Securities Mortgage Loan Trust, Series 2007-OA3, by HSBC Bank USA, National Association, as Trustee v. DB Structured Products, Inc., 13-cv-2888 (S.D.N.Y.);
Deutsche Alt-A Securities Mortgage Loan Trust, Series 2007-OA4, by HSBC Bank USA, National Association, as Trustee v. DB Structured Products, Inc., 13-cv-3685 (S.D.N.Y.)

Dear Judge Sweet:

We represent the parties in the above-referenced actions and write to respectfully request an extension of the deadline for the completion of fact discovery previously ordered by the Court. See Docket Nos. 36 and 37. The parties have agreed to extend fact discovery, which is currently scheduled to close on October 30, 2014, to October 30, 2015. Accordingly, enclosed herewith is a proposed Joint Stipulation for Extension of Deadlines. The parties are continuing to meet and confer to arrive at an appropriate schedule for the completion of expert discovery, and have agreed to submit a letter and proposed revised scheduling order in accordance with Rule 1.E. of Your Honor's Individual Practices as soon as such an agreement is reached. The parties have not previously requested an extension of time for any of the so-ordered deadlines.

Respectfully submitted,

HOLWELL SHUSTER & GOLDBERG LLP

By: 

Michael S. Shuster
Daniel Goldberg
Avi Israeli
Hannah Sholl
Lani Perlman
125 Broad Street, 39th Floor
New York, NY 10004
(646) 837-5151

*Attorneys for Plaintiff HSBC Bank USA,
National Association*

SIMPSON THACHER & BARTLETT LLP

By: 

Thomas C. Rice
David J. Woll
Evan Cohen
Isaac Rethy
425 Lexington Avenue
New York, NY 10017
(212) 455-2000

*Attorneys for Defendant DB Structured
Products, Inc.*